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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 MICHAEL J. WELLS,

CASE NO. 3:19-CV-00407-MMD-CLB

9 Plaintiff,

10 v.

11 ISABELLA CASILLAS GUZMAN, in her
official capacity as the Administrator of the
12 U.S. SMALL BUSINESS
ADMINISTRATION, *et al.*,

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
OPPOSITION TO MOTION TO
DISMISS (FIRST REQUEST)**

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14 Defendants.
_____ /

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17 Plaintiff, MICHAEL J. WELLS, and Defendant, ISABELLA CASILLAS GUZMAN, in her
18 official capacity as the Administrator of the U.S. SMALL BUSINESS ADMINISTRATION, by and
19 through their counsel of record, hereby stipulate and agree, that Plaintiff shall have up to and
20 including **Wednesday, May 18, 2022**, to file his Opposition to the Motion to Dismiss filed by
21 Defendant GUZMAN regarding the above-mentioned case.

22 This Stipulation is made and based on the fact that counsel for plaintiff is in the process of
23 moving buildings, and that the main handling attorney, John Boyden, *Esq.*, recently left the firm,
24 and significant additional time is needed to address these issues, and the pending motion, such that
25 a significant extension of 90 days (from the current February 17, 2022 due date) is needed. All
26 attorneys have agreed to said extension and are working together professionally.

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1 For these reasons, the parties have hereby entered this extension request, which is the first
2 request for an extension of time.

3 DATED this 7th day of February, 2022.

4 ERICKSON, THORPE & SWAINSTON, LTD.

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6 By /s/ Paul M. Bertone
7 PAUL M. BERTONE, ESQ. (SBN 4533)
8 P.O. Box 3559
9 Reno, Nevada 89505
Telephone: (775) 786-3930
Attorneys for Plaintiff Michael J. Wells

10 DATED this 8th day of February, 2022.

11 U.S. ATTORNEYS OFFICE, CIVIL DIVISION

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13 BY: /s/ Holly Vance
14 HOLLY VANCE, ESQ.
15 100 W. Liberty Street, Suite 600
16 Reno, NV 89501
Attorneys for Defendant
Linda McMahon

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18 **ORDER**

19 Having considered the within Stipulation for extension of time to file the Opposition to
20 Motion to Dismiss, and good cause appearing,

21 IT IS HEREBY ORDERED that Plaintiff MICHAEL J. WELLS shall have up to and
22 including **Wednesday, May 22, 2022**, to file his Opposition to the Motion to Dismiss filed by
23 Defendant GUZMAN in the above-captioned case.

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25 DATED this 9th day of February, 2022.

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28 UNITED STATES DISTRICT JUDGE